

REMARKS/ARGUMENTS

35 USC §103(a)

Independent claim 1 is rejected under §103(a) over Penn et al. (US 6,169,605) in view of Miyake et al. (US 6,174,039). This rejection is respectfully traversed.

The invention of claim 1 is recited as printing at least part of each of multiple layers simultaneously. This feature of the claimed invention is illustrated, for example, in Fig. 1 of the present specification, in which layers 110, 113, 128, 118, and 119 are all being printed to simultaneously by respective printheads.

It is respectfully submitted that the above feature of the claimed invention is not in fact taught or suggested by Penn et al. The rejection contends that Penn et al., with reference to Fig. 12, discloses the feature of printing to multiple layers simultaneously. However, a careful reading of the description corresponding to Fig. 12 of Penn et al. clarifies that Fig. 12 does not in fact depict a simultaneous printing to multiple layers.

Applicant refers, for example, to col. 16, lines 46 - 51, of Penn et al. This portion of Penn et al. describes that printhead 20 dispenses conductive object material 25, whilst printhead 670 dispenses insulative support material 35. It is further disclosed at this portion of Penn et al. that "*In the same pass, printhead 670 dispenses insulative support material 35 as required to fill the remainder of the layer.*" (emphasis added). This description clearly indicates that the printheads 20 and 670 of Penn et al. print to the same layer, rather than to different layers.

Further support of Applicant's position that Penn et al. does not disclose printing to multiple layers simultaneously, can be found at col. 11, lines 8 - 38, of the description. It is disclosed thereat that the slice data for one layer is loaded, and the layer according to the slice data printed. When printing of the layer is completed, the slice data for a next layer is loaded and the platform (15) is lowered by one layer's thickness to commence printing of the next layer.

In view of the above, it is respectfully submitted that Penn et al. does not teach a series of printheads for printing to multiple layers simultaneously, as claimed in claim 1. Miyake et

al. also fail to teach or suggest the above features. It is clear from the description of Miyake et al. that multiple passes/scans are made in order to print a completed image.

Claim 1, and the pending claims dependent therefrom, are submitted to be novel and inventive for at least the above reasons.

Favorable reconsideration of the application in light of the above amendments and remarks is respectfully requested. Applicant looks forward to word of further official communication in due course.

Very respectfully,

Applicant/s:



Kia Silverbrook

C/o: Silverbrook Research Pty Ltd
393 Darling Street
Balmain NSW 2041, Australia

Email: kia.silverbrook@silverbrookresearch.com

Telephone: +612 9818 6633

Facsimile: +61 2 9555 7762